

Federal On-Scene Coordinator's
Report
Immediate Removal Action
Turco Coatings Facility
Phoenixville, Pa.

Feb. 9, 1983 to March 11, 1983



REGION III
CERCLA EMERGENCY RESPONSE/IMMEDIATE REMOVAL ACTION

FACTS SHEET

SITE: Turco Coatings Facility

SIZE: 1 acre

LOCATION: Phoenixville, Pennsylvania

APPROVAL DATE: February 10, 1983

PROJECT DATES: February 10, 1983 through March 11, 1983

DESCRIPTION: The Turco Coatings facility manufactured paints, varnishes and other allied products. A site visit revealed over 500 drums and several storage tanks on site containing waste materials. Many drums were rusted and haphazardly strewn about. Large areas of stained soils surrounding the drums indicated that drum contents had spilled or leaked out. Data collected during site visits confirmed that the site posed an imminent and substantial threat to the public health due to fire, explosion and direct contact threats.

HAZARDOUS MATERIAL: Paint solvents and paint solids.

QUANTITIES REMOVED: 5700 gallons flammable liquids, 350 drums flammable solids, 64 tons hazardous sludges and solids, 1600 gallons contaminated water.

OSC: Bruce Potoka

REMOVAL CONTRACTOR: Rollins Environmental Services, Inc.

DISPOSAL LOCATIONS: Rollins, Bridgeport, NJ, RCRA #NJD053288239 (incineration)
DuPont Chambersworks, Deepwater, NJ, RCRA #NJD002385730 (wastewater)
SCA Landfill, Model City, NY, RCRA #NYD049836679

PROJECT CEILING: \$204,930

PROJECT COST: \$191,996 (estimate)

COMMENTS: The site was located in the center city of Phoenixville, which required the utmost care in handling of drums and in monitoring air quality. On-site activities were hampered by heavy snow (>24") and severe mud conditions.


Bruce Potoka, OSC

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SECTION I

FOREWORD

Turco Coatings
OSC Report
Foreword

This report is submitted in accordance with procedures outlined in the National Oil and Hazardous Substances Contingency Plan. The primary thrust of the plan is to provide a coordinated Federal response capability at the scene of an unplanned or sudden discharge of oil or hazardous substance that poses a threat to the public health or welfare. In addition, the provisions of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), permit a coordinated Federal response to mitigate situations at hazardous waste sites which pose an imminent hazard to public health. The former Turco Coatings facility presented an imminent hazard to public health in terms of fire and explosion as well as direct contact, thus providing a legal basis for Federal response activities. The provisions of the National Contingency Plan were implemented by the United States Environmental Protection Agency, Region III, Philadelphia, PA.

Special thanks are extended to the many agencies and groups who participated in the Federal Removal Activity. The extra effort provided by all these agencies and groups enabled a timely and efficient cleanup, successfully removing the threat to public health and the environment.

The Norristown Region of the Pennsylvania Department of Environmental Resources, with the assistance of Mr. Frank Holmes (PADER-OSC), added immeasurably to the overall success of this operation. The Borough of Phoenixville, under the direction of Borough Manager Mr. Mark Coren provided both logistical and material support throughout this project which greatly aided on-scene operations. The borough and local agencies were closely involved with all phases of the removal.

The continuity of operations through resources marshalled to deal with changes under emergency conditions, required extra effort by all involved individuals. I wish to thank all of the persons who contributed to the successful response and commend them on their professional and expert handling of this major pollution incident.

Bruce Potoka
On-Scene Coordinator
Region III, EPA

SECTION II
INTRODUCTION

Introduction

The Turco Coatings facility is located adjacent to the French Creek in the Borough of Phoenixville, Pennsylvania. The facility manufactured paints, varnishes, enamels, hand cleaners and allied products during a period of approximately 45 years. During this period, the Turco facility reportedly utilized 55-gallon drums in conjunction with above and below ground tanks for waste storage. At least one area on-site indicated that on-site disposal did occur. This was substantiated during conversations with past employees. The Turco facility filed for bankruptcy sometime in January of 1980. Superior Industries, Ltd., a beverage company located adjacent to Turco, purchased the property with the intentions of cleaning the property and expanding their operations.

A site assessment performed by EPA, FIT and TAT in May of 1982 indicated that roughly 800, 55-gallon drums were located on-site. Most of these drums were open and many were rusted and haphazardly strewn about. Large areas of stained soil were noted in the vicinity of the drum piles, indicating that their contents had spilled or leaked on the ground. Subsequent site visits indicated that the owner had begun a limited cleanup of the site which primarily consisted of relocating waste materials to an unsecured, semi-enclosed area at the rear of the property, thereby greatly increasing the risk of fire and explosion.

A site visit on February 3, 1983 by EPA, ERT, TAT, PADER and local officials revealed over 500 drums and several storage tanks on site containing waste materials. Organic vapors were detected on-site using photoionization and flame ionization detectors. In addition, explosivity readings taken on-site in the head space of several drums indicated the potential for fire and explosion.

The owner refused to take further action to remove these wastes from the site. Fire Department reports included several fires within the period prior to the cleanup, confirming the threat of vandalism, arson and consistent use of the facility as a "hang-out" by local youths.

Introduction (cont'd)

Based on these observations and consultation with State and local agencies, the OSC determined that the site posed an imminent and substantial threat to the public health due to the fire, explosion and direct contact threats.

Funding was received on February 10, 1983. Cleanup operations commenced immediately and continued through March 11, 1983.

SECTION III

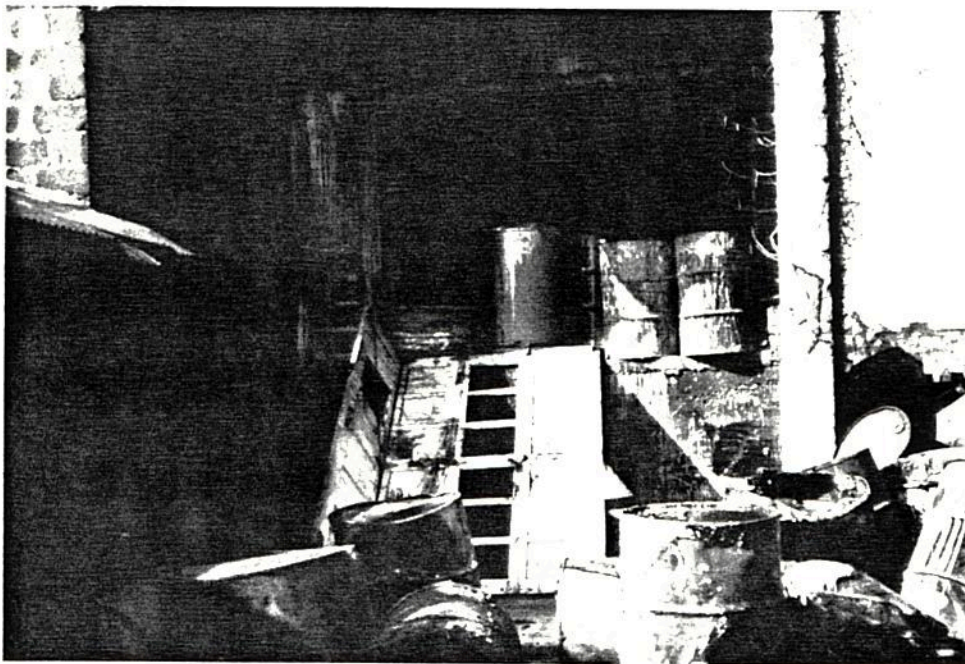
PHOTOGRAPHS



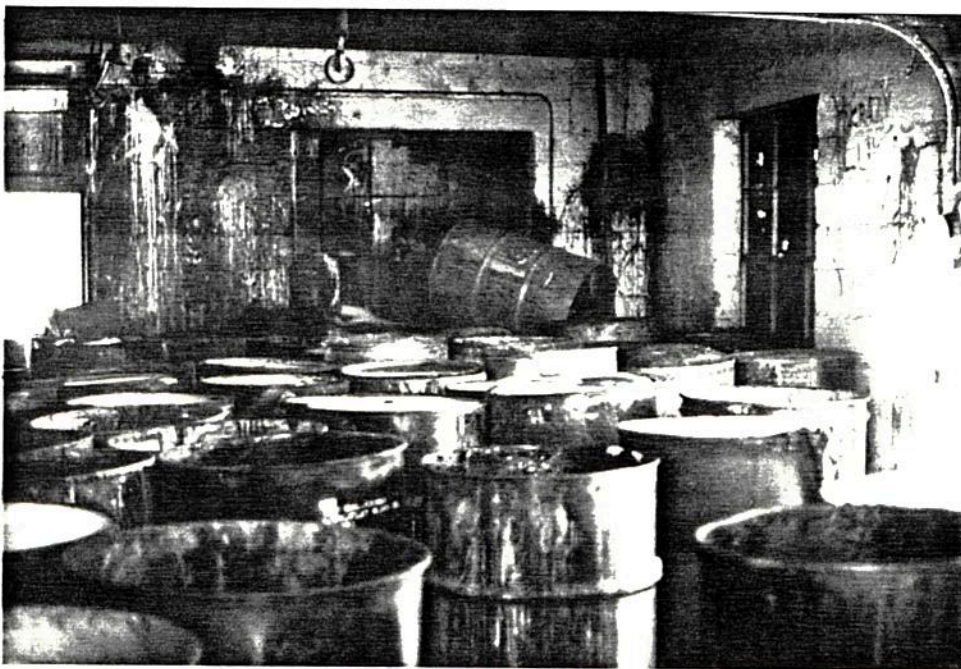
1. First day of operations, February 2, 1983 showing heavy snowfall and main drum storage shed.



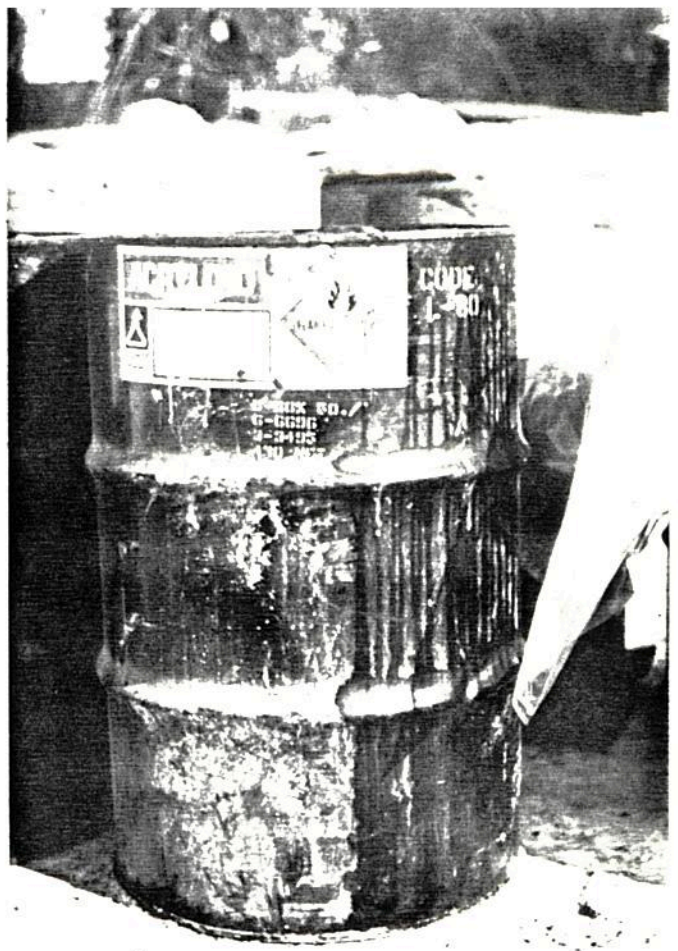
2. Workers clearing 24" of snow to create a drum staging area.



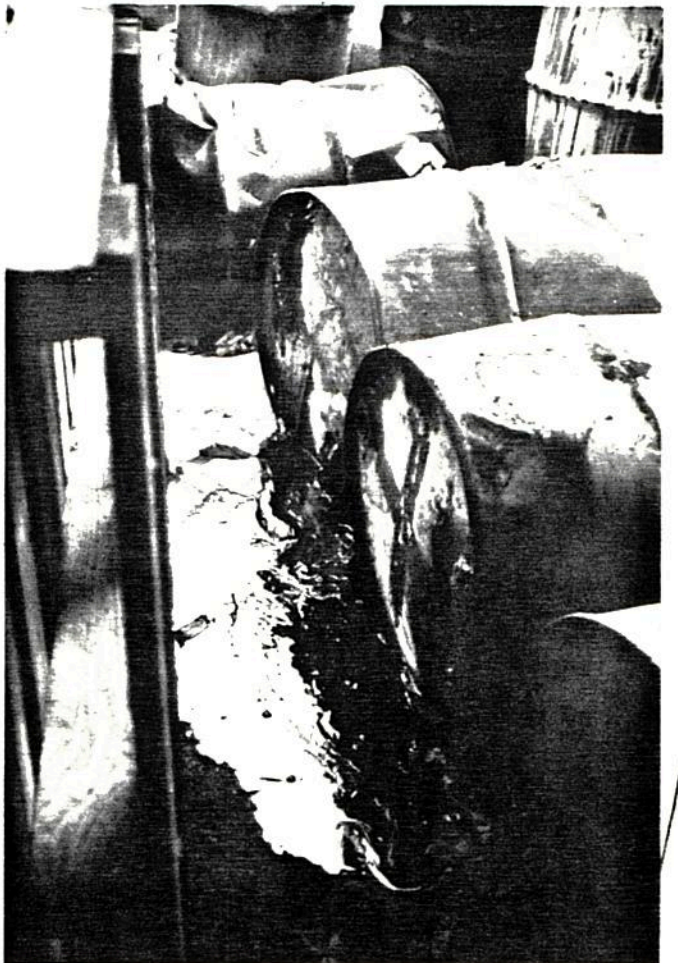
3. Main drum storage shed - outside of loading dock.



4. Main drum storage shed - inside loading dock area.



5. Drum showing Flammable Liquid placarding.



6. Drums in main storage shed showing spillage.



7. EPA Environmental Emergency Branch monitoring drum staging operation.



8. U.S. Coast Guard - Atlantic Strike Team member passes through decontamination zone (DRZ).



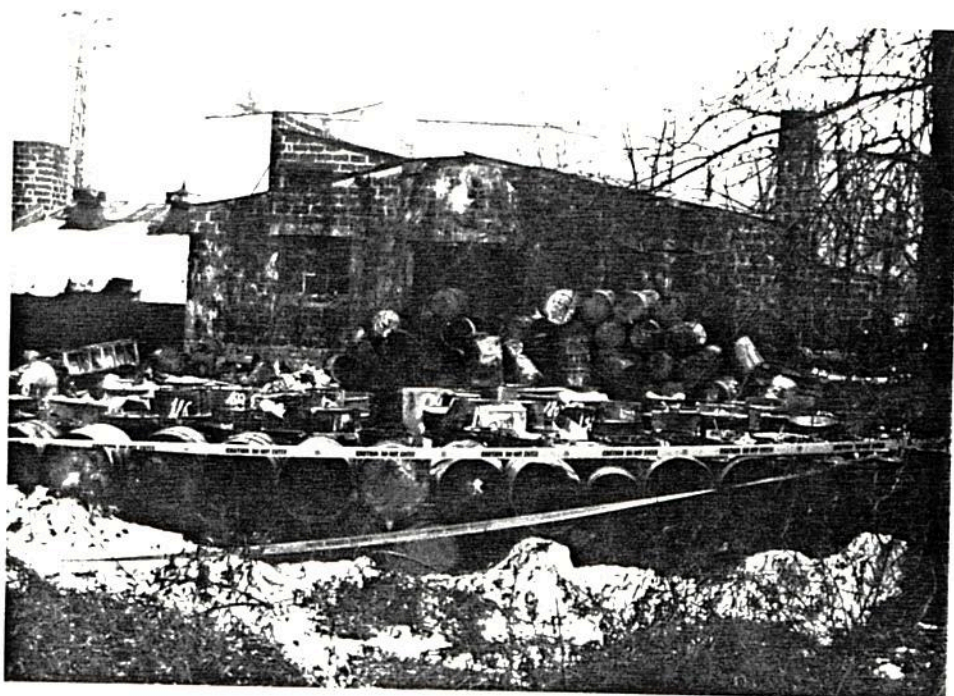
9. Member of the U.S. Coast Guard - Atlantic Strike Team meets with the OSC to review contractor daily reports as part of the detailed cost control and contractor monitoring followed during the Turco Removal.



10. Frank Holmes, PADER OSC, uses a metal detector to search for buried tanks near secondary drum storage area.



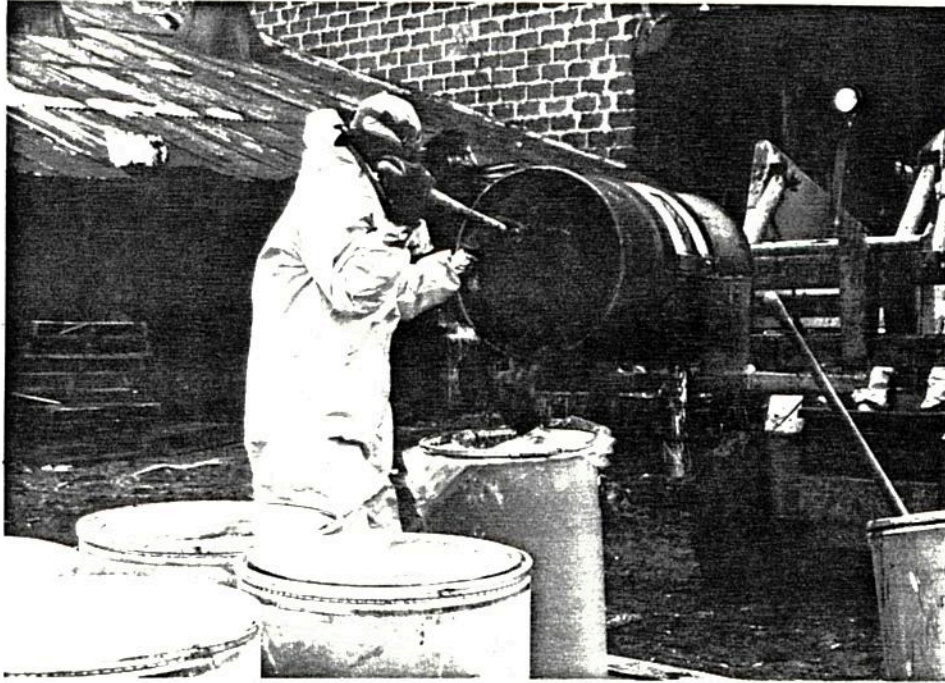
11. Secondary drum storage area - staging operations. Shows proximity to local industry (background).



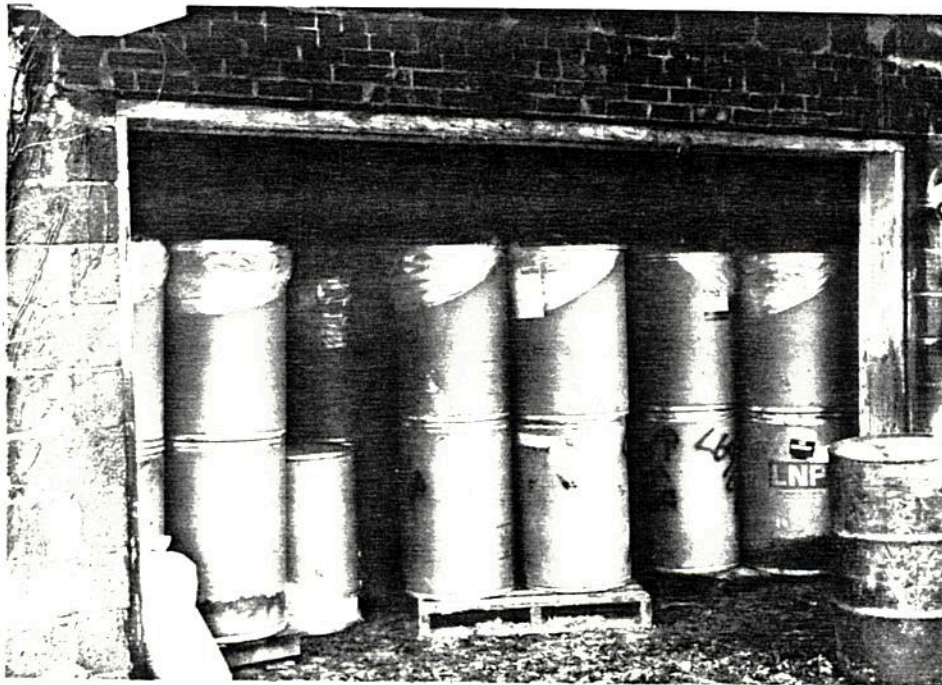
12. Drum staging area during peak of removal activity.



13. Backhoe removing drums from burial area adjacent to railroad tracks.



14. Flammable solids and sludges were repacked into fiber drums for incineration.



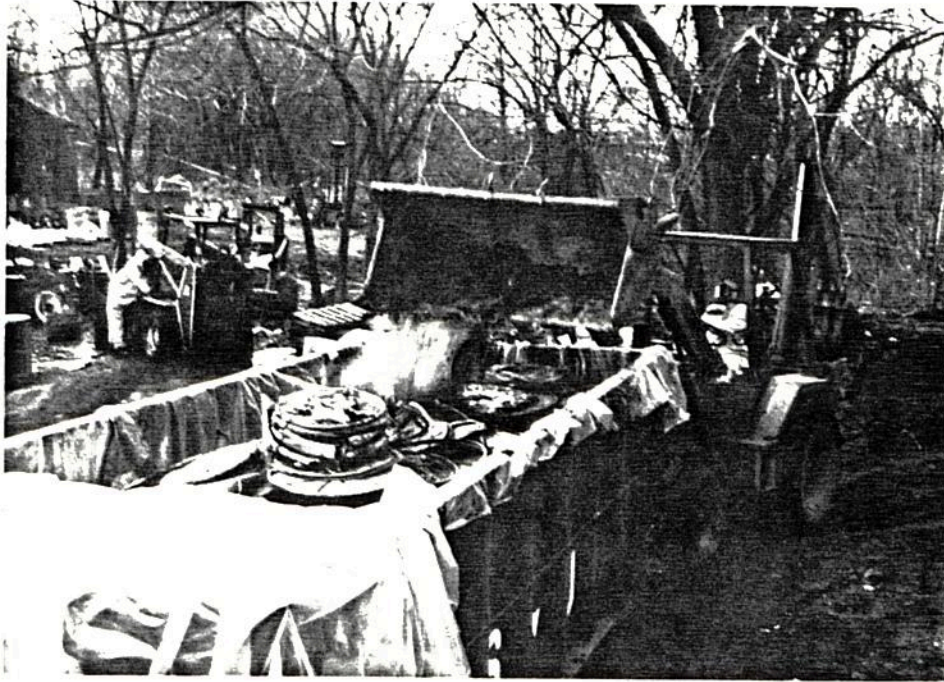
15. Fiber drums were staged in the main storage shed awaiting transportation to the prime contractor's incinerator.



16. In an effort to minimize disposal costs, acceptable emptied drums were taken by a drum reclaimer.



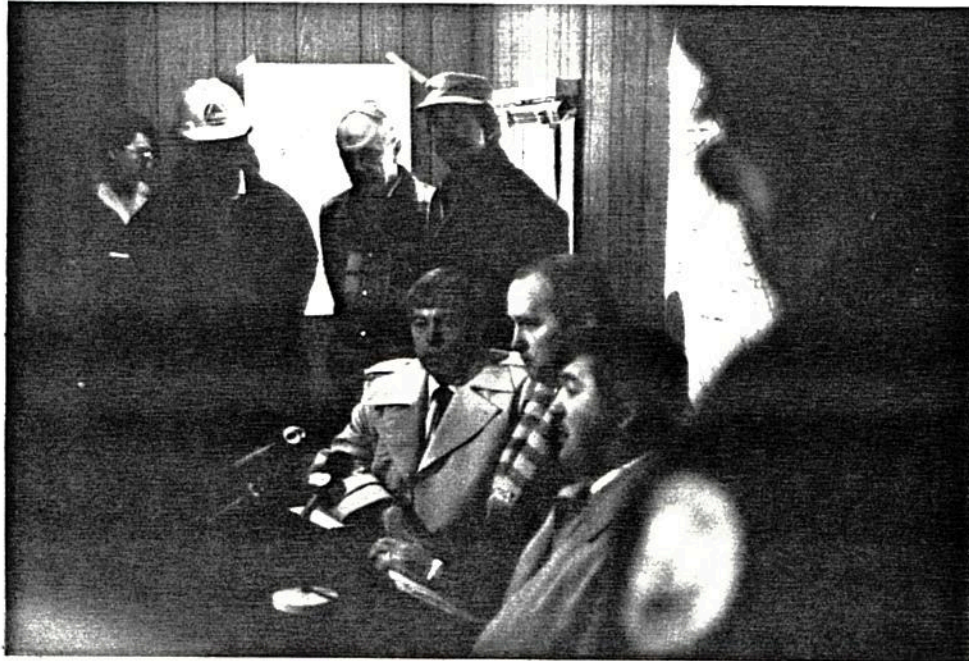
17. Drum unacceptable to the reclaimer were crushed for disposal.



18. Crushed drums were mixed with non-flammable solids in 20 cubic yard bulk containers.



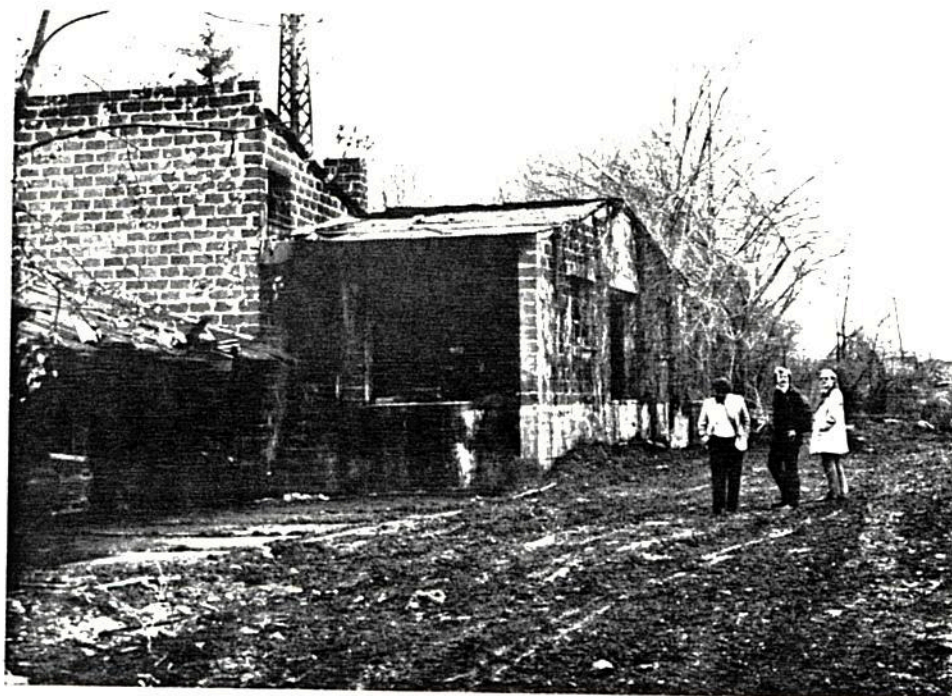
19. US Coast Guard - Atlantic Strike Team member, assigned as site safety monitor, assists TAT in preparations for site entry.



20. A press conference was conducted in the command post during the early phases of the project.



21. George Bochanski, US EPA OPA, conducts post removal press briefing.



22. Upon completion of the Immediate Removal, the OSC toured the site accompanied by Bruce Bietler, PADER and Phoenixville Borough Manager, Mark Coren.

SECTION IV

ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS

ROSTER OF AGENCIES AND ORGANIZATIONS

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF WORK
U.S. EPA Region III Environmental Emergency Branch 6th & Walnut Sts. Philadelphia, PA. (215) 597-4553	Bruce Potoka	Federal On-Scene Coordinator
U.S. EPA Environmental Response Team GSA Raritan Depot Edison, NJ 08817 (201) 321-6740	Dr. Joseph Laforanara Andre Zownir	Developed site safety protocol. Scientific and technical expertise.
U.S. EPA Region III Office of Public Affairs 6th & Walnut Sts. Philadelphia, PA. (215) 597-9800	George Bochansky Margot Hunt	Coordinated press coverage of site activities. Held several on-site press briefings.
U.S. EPA Region III Enforcement Division 6th & Walnut Sts. Philadelphia, PA (215) 597-3439	Joseph Melvin, Attorney	Assisted OSC with legal concerns.
U.S. EPA Headquarters 401 M Street, S.W. PM-214-F Washington, DC 20460	Ron Kovak	Contracting Officer

ROSTER OF AGENCIES AND ORGANIZATIONS

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF WORK
<p>Center for Disease Control EPA Superfund Office 6th & Walnut Sts. Philadelphia, PA. 19106 (215) 597-7291</p>	<p>Charles J. Walters</p>	<p>Developed operational codes - attached to community action plan.</p> <p>Liason with all concerned county and local health organizations.</p>
<p>U.S. Coast Guard Atlantic Strike Team Elizabeth City, NC 27909 (919) 338-1100</p>	<p>Lieutenant Karen Levy</p> <p>Senior Chief William Harrison</p>	<p>Site safety monitor, detailed contractor monitoring, perimeter air monitoring, logistical support.</p>
<p>Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Solid Waste Management 1875 New Hope Street Norristown, PA 19401 (215) 631-2423</p>	<p>Frank Holmes Solid Waste Specialist</p>	<p>State On-Scene Coordinator. Coordinated all State, County and local agencies. (see organizational structure).</p>
<p>Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Litigation 1315 Walnut St. - Room 1200 Philadelphia, PA 19107 (215) 238-6596</p>	<p>Ronald J. Brubaker Assistant Attorney General</p>	<p>Site Visit</p>
<p>Commonwealth of Pennsylvania Southeastern District Reading State Office Bldg. 625 Cherry St. Room 442 Reading, PA 19602 (215) 378-4351</p>	<p>Gary A. Schultz Environmental Health Specialist</p>	<p>Reviewed site evacuation plan. Assisted in review of health issues.</p>

ROSTER OF AGENCIES AND ORGANIZATIONS

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF WORK
Pennsylvania State Police Embreeville Station RD. #4 Coatesville, PA 19320 (215) 269-5355	Trooper Richard M. O'Brien	Ensured proper decommissioning of emptied underground tanks.
Chester County Health Department 326 North Walnut St. West Chester, PA 19380 (215) 431-6225	Walter Leuchak, Environmental Engineer	Site visit
	Carole Rubley, Solid Waste Coordinator	Site visit
Chester County Emergency Services 14 East Biddle St. West Chester, PA 19380 (215) 431-6160	John J. McNamara, Assistant Director	Site visit
	Ken Stewart	Training film produced during the Turco Removal.
Borough of Phoenixville Borough Hall 140 Church Street Phoenixville, PA 19460 (215) 933-8803	Mark Coren, Borough Manager	Coordination of all Borough resources. Site visits, evacuation contact point.
Borough of Phoenixville Borough Hall 140 Church Street Phoenixville, PA 19460 (215) 933-8803	Alexander Fahrer, Health Officer	-Provided State/F&D officials with official Borough concern about site. -Reviewed site activities to assure level of safety maintained for Borough residents.
Borough of Phoenixville Borough Hall 140 Church Street Phoenixville, PA 19460 (215) 933-88003	John P. Krill, Fire Chief	-Provided initial fire hazard assessment of site. -Provided fire fighting support capabilities and expertise.

ROSTER OF AGENCIES AND ORGANIZATIONS

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF WORK
Borough of Phoenixville Borough Hall 140 Church St. Phoenixville, PA 19460 (215) 933-1180	Henry Rodrique, Police Chief	-Provided 24 hour security for site activities. -Assured the safe routing of hazardous materials vehicles thru Borough.
Borough of Phoenixville Borough Hall 140 Church Street Phoenixville, PA. 19460 (215) 933-8801	Joe Benyo, Chief Inspections Officer	Inspection of drum storage sheds for possible condemnation/demolition.
Phoenixville Health Board Borough Hall 140 Church Street Phoenixville, PA. 19460 (215) 933-9055	Jean Stephenson Elizabeth Davis	Reviewed site activities to assure the Borough residents were guaranteed a high level of protection.
Phoenixville Emergency Management 316 Virginia Avenue Phoenixville, PA 19460 (215) 933-5954	Donald Sees Bernard Godlewski	-Logistics Officer. -Developed Community Relations Plan. -Frequent Site Visits to Monitor Removal Activity.
Phoenix Steel Corp. 121 Bridge Street Phoenixville, PA 19460 (215) 935-5461	Vincent Pongia	Provided use of truck weighing scales.
	Herman A. John, Director Manufacturing Services	

ROSTER OF AGENCIES AND ORGANIZATIONS

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF WORK
<p>Roy F. Weston, Inc. Spill Prevention & Emergency Response Division 5090 Central Highway, Suite #3 Pennsauken, NJ 08109 (609) 663-77995</p>	<p>John Claypool Robert Caron</p>	<p>Technical Assistance Team -Developed Air Monitoring Plan -Developed Disposal Options/Cost -Developed Post Removal Status Report -Drum, Tank and Soil Sampling Programs -Site Activity Documentation</p>
<p>Rollins Environmental Services, Inc. (NJ) P.O. Box 221 Bridgeport, NJ 08014 (609) 467-3100</p>	<p>Stephen Deitch, Field Services Manager</p>	<p>Prime Contractor</p>
	<p>Andrew Dark, Supervisor</p>	

SECTION V
SUMMARY OF EVENTS

a. Funding Request

A copy of the OSC's request for CERCLA funding to support the Immediate Removal Action at the former Turco Coatings facility is included in this section.

b. Cause of the Incident

The Turco Coatings facility was in operation for approximately 45 years during which wastes were produced and reportedly stored in 55-gallon drums, above and below ground storage tanks. After declaring bankruptcy, the site was purchased by a company known as Superior Beverages.

In July of 1982, the new owner began a superficial cleanup of the property, to facilitate his leasing of a portion of the property. Cleanup efforts consisted of relocating waste materials to an unsecured, semi-enclosed area at the rear of the site. A site visit by EPA, FIT and TAT indicated that this was a problem site. Subsequent negotiations with the new property owner indicated that he would initiate clean-up activities.

A site visit on February 3, 1983 by EPA, ERT, TAT, PADER and local officials yielded the following:

- ° over 550 drums stored in the semi-enclosed building on-site. Most were open, rusted, and leaking.
- ° organic vapor readings as high as 250ppm in the drums.
- ° easy access to the site, with evidence that the site was frequented by persons and used as a "hangout" by teenagers.
- ° local fire department reported several small fires at the facility in the recent past.

Discussions with the new owners indicated that he would take no further action. After further discussions with PADER, ERT, TAT and local officials the OSC determined that a threat did exist at this site via fire, explosion and direct contact threats. Discussions and consultations with officials from the Center for Disease Control, State Health and County Health indicated that a public health threat did exist at this site in terms of direct contact and inhalation.

c. Initial Situation

As discussed earlier, the following conditions existed at the site: (see site sketch)

- ° over 550 55-gallon drums, open, rusted and leaking.
- ° several dilapidated buildings
- ° several buried tanks containing unknown materials
- ° previous sampling work (see attached analytical) indicated solvents and paint wastes of a flammable nature
- ° approximately 100,000 gallons of fuel oil storage located within 100 feet of the site (unrelated facility).

The OSC, working closely with an involved community, coordinated the initial response actions in a rapid fashion in order to assure that work would commence immediately. Funding was received on February 10, 1983 and a contractor (Rollins Environmental Services, Inc.) was hired on the same date.

Mobilization began on the evening of February 10 in anticipation of a major snow storm which did occur on February 11, 1983. Despite inclement weather, work commenced on February 11, 1983.

d. Organization of the Response

When the OSC declared a Federal Removal Activity for Turco Coatings, many governmental and private resources were utilized. Table V-1 and Figure V-I identify these resources and portray how they aided the project. Mr. Holmes, PADER coordinated the State, County and Borough forces. Similar organizational aid was provided by Mark Coren, Phoenixville Borough Manager, who synchronized all the Borough departments and resources. Section IV, Roster of Agencies, Organizations and Individuals, lists all the involved parties and briefly describes the assistance they provided during this removal project.

e. Resources Committed

Upon assessing the situation, the OSC initially determined that \$156,200.00 was needed to support removal activities at the former Turco Coatings facility. Discovery of additional hazardous materials during the course of the removal expanded both the scope of work and duration of the project. These discoveries necessitated increased expenditures. The OSC requested \$48,730.00 on February 24, 1983 to support continuation of the removal. The funding increase was approved February 25, 1983, raising the project ceiling to \$204,930.00.

Intramural costs were tracked on a daily basis. These expenditures were subtracted from the \$204,930 ceiling to ensure that the project remained under ceiling. It became apparant that total funds expended would exceed the ceiling and therefore the OSC submitted a second request for additional funding. Guidance from EPA Headquarters contracting officials indicated that subtracting intramural expenditures from the contract ceiling was an incorrect procedure. The purpose of tracking intramurals was to ensure that total project costs did not exceed the one million dollar limitation set forth in CERCLA. Therefore, the \$204,930.00 ceiling applied to extramural costs incurred by the prime contractor. Total funds expended by the prime contractor were \$191,996.38 leaving a blance of \$12,933.62 which was returned to CERCLA.

	<u>Ceiling</u>	<u>Total Expenditures</u>
Prime Contractor	\$204,930.00	\$191,996.38
<u>Intramurals</u>		
US EPA		\$ 6,805.00
ERT		\$ 2,808.57
USCG		\$ 14,113.72
TAT		\$ 11,392.00
		<u>35,119.29</u>

f. Location of the Incident

The site of the Turco Coatings Immediate Removal is located at 75° 31' 30" longitude and 40° 7' 54" latitude. The former Turco Coatings facility lies adjacent to heavily populated residential area of Phoenixville, PA. The main drum storage shed lies 75 yards from French Creek on the south bank. Figures V-II and V-III illustrate the location of the incident. Figure V-IV is a site sketch of the Turco Coatings facility.

g. Details of Federal or State Efforts to Replace Natural Resources

Discussions between the OSC and a former employee of Turco Coatings resulted in dissemination of information regarding the extent of contamination at Turco. Drums were routinely opened and allowed to drain into a swale adjacent to the railroad tracks. This practice was discontinued when Phoenixville Borough officials discovered contamination in French Creek presumably due to leaching solvents from Turco.

Surface soil contamination was generated during the removal by the movement and sampling of drums. Soil contamination was removed as part of this project in an effort to leave the site as "clean" as possible. Upon completion of the project, the drum staging area was regraded to eliminate physical hazards and minimize pooling of water on-site.

h. Details of Threat Abatement Actions

The entire Turco Coatings Removal centered on the abatement of the fire and explosion threats which existed at the facility. The highly flammable nature of the contents of many drums and the unexpected high flammability of the solvents located in underground tanks required coordinating the Phoenixville Fire Department in the response.

ERT drafted a site safety protocol which was implemented by the OSC. From the first day of operations, the site safety officer (one member of the USCG-AST was assigned this duty for the duration of the project) required all personnel either visiting the site or participating in the actual removal, to carefully read and sign the site safety protocol. Site safety on-site was strictly enforced from the decontamination reduction zone (DRZ) by another member of the AST.

Phoenixville Emergency Management Agency (Phx EMA) drafted the Community Relations Plan (also known as the Temporary Relocation Plan) which was discussed at the pre-site work strategy meeting held at the Phoenixville Council Chambers. This plan designated the perimeter, pick-up points and main routes for an evacuation should an incident occur. At the pre-site work strategy meeting, CDC outlined the action levels for initiation of a Temporary Relocation. These levels were attached to the plan.

i. Facts and Statistics

1. Duration of Removal

February 11, 1983 to March 9, 1983

2. Total CERCLA funds expended

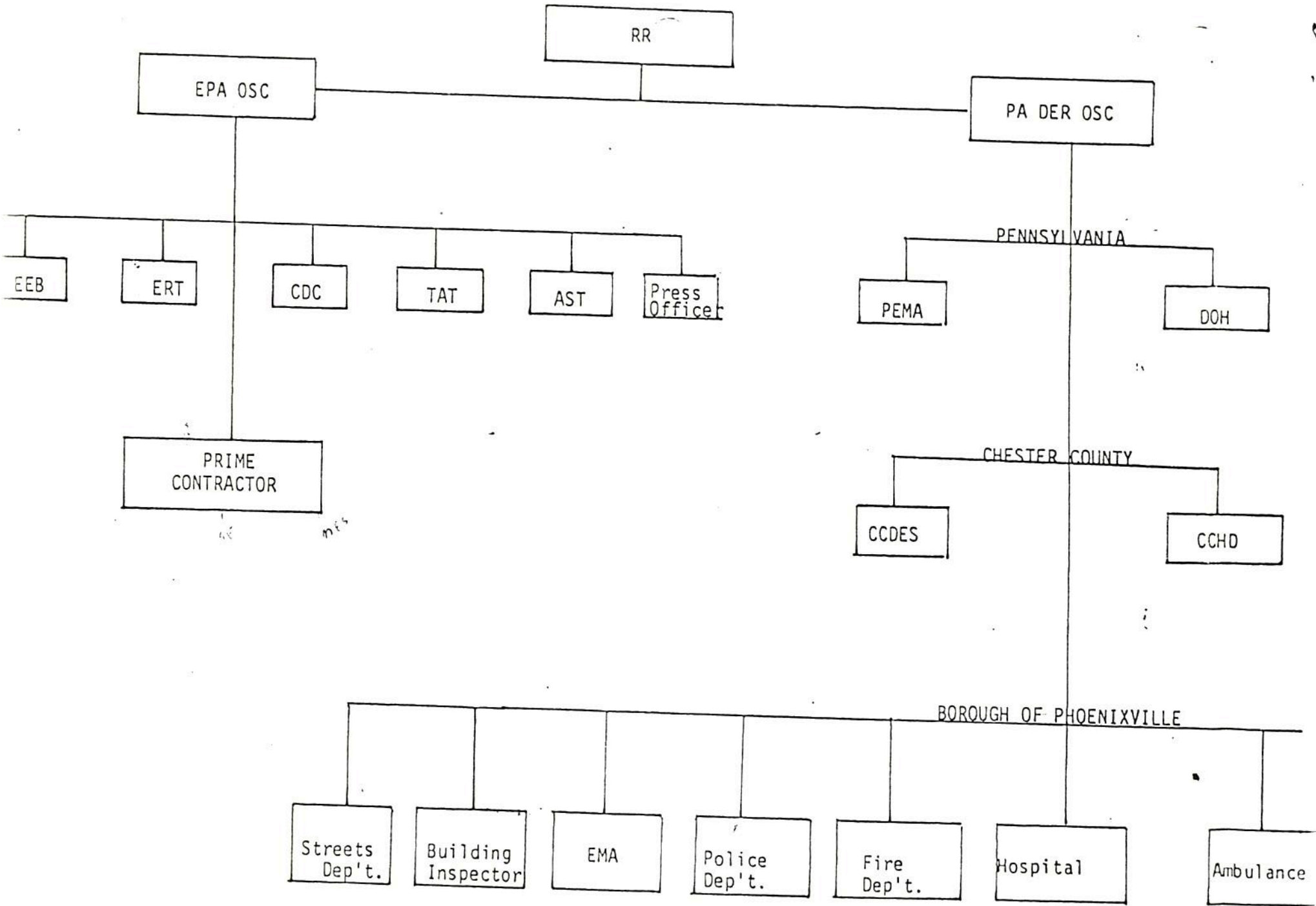
\$191,996.38

3. 640 drums were removed/disposed as follows:

<u>Type</u>	<u>Amount</u>	<u>Disposal</u>
a. Flammable liquids	6,000	Rollins Incinerator
b. Flammable solids	350-35 gallon fiber drums	Rollins Incinerator
c. Contaminated Clothing	50 fiber drums	Rollins Incinerator
d. High flash point	4 bulk containers (20 cu. yards each)	BFI/CECOS landfill - N.Y.
e. contaminated soil	1 bulk container (20 cubic yards)	BFI/CECOS landfill - N.Y.
f. non-contaminated drums	80 drums	drum reclaimer
g. contaminated water	1600 gallons	DuPont -waste water treatment.
h. crushed contaminated drums	1 bulk container (20 cubic yards)	BFI/CECOS landfill - N.Y.

See Disposal Flowchart

4. Total of 24 agencies were involved in the removal.

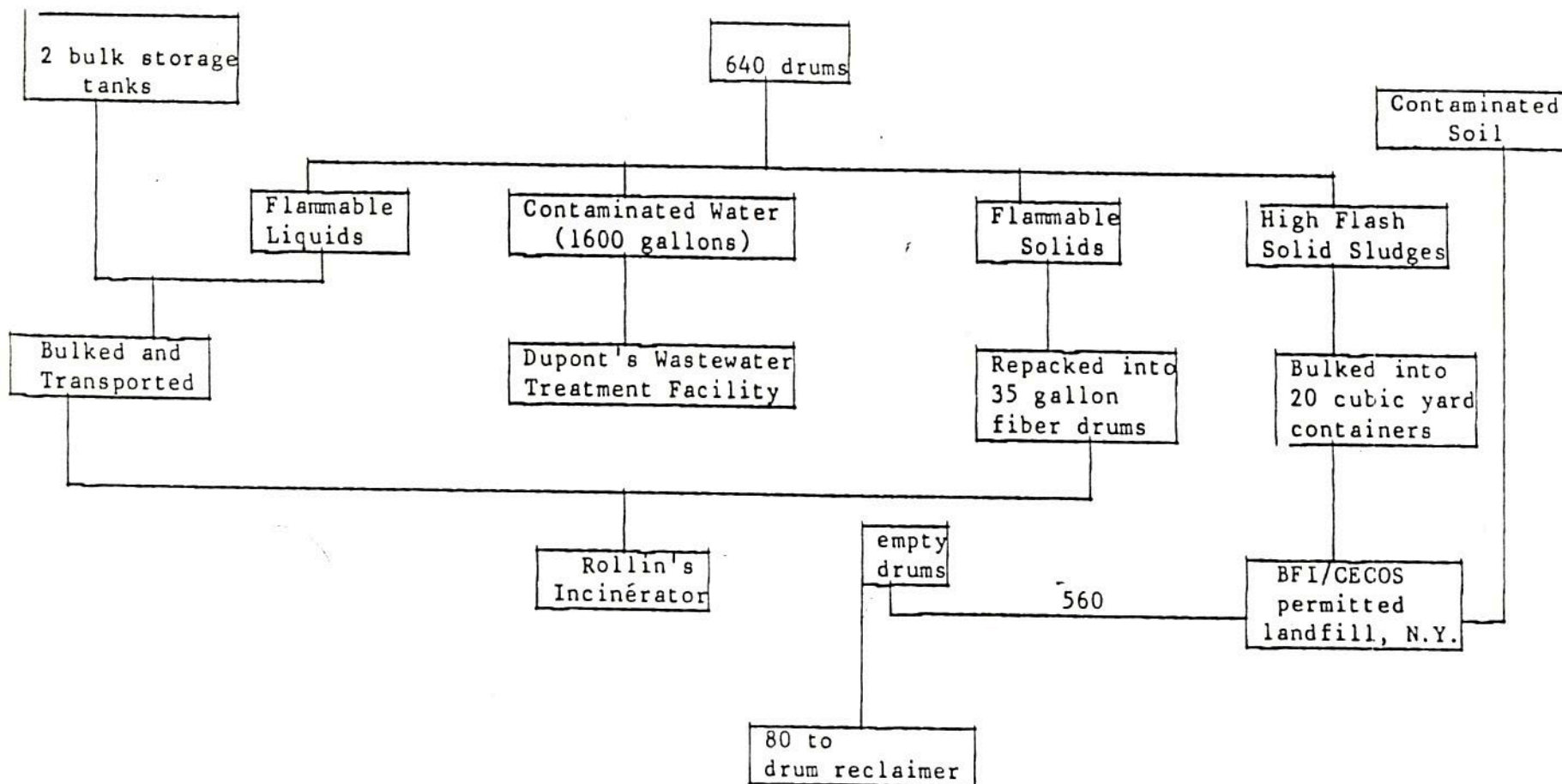


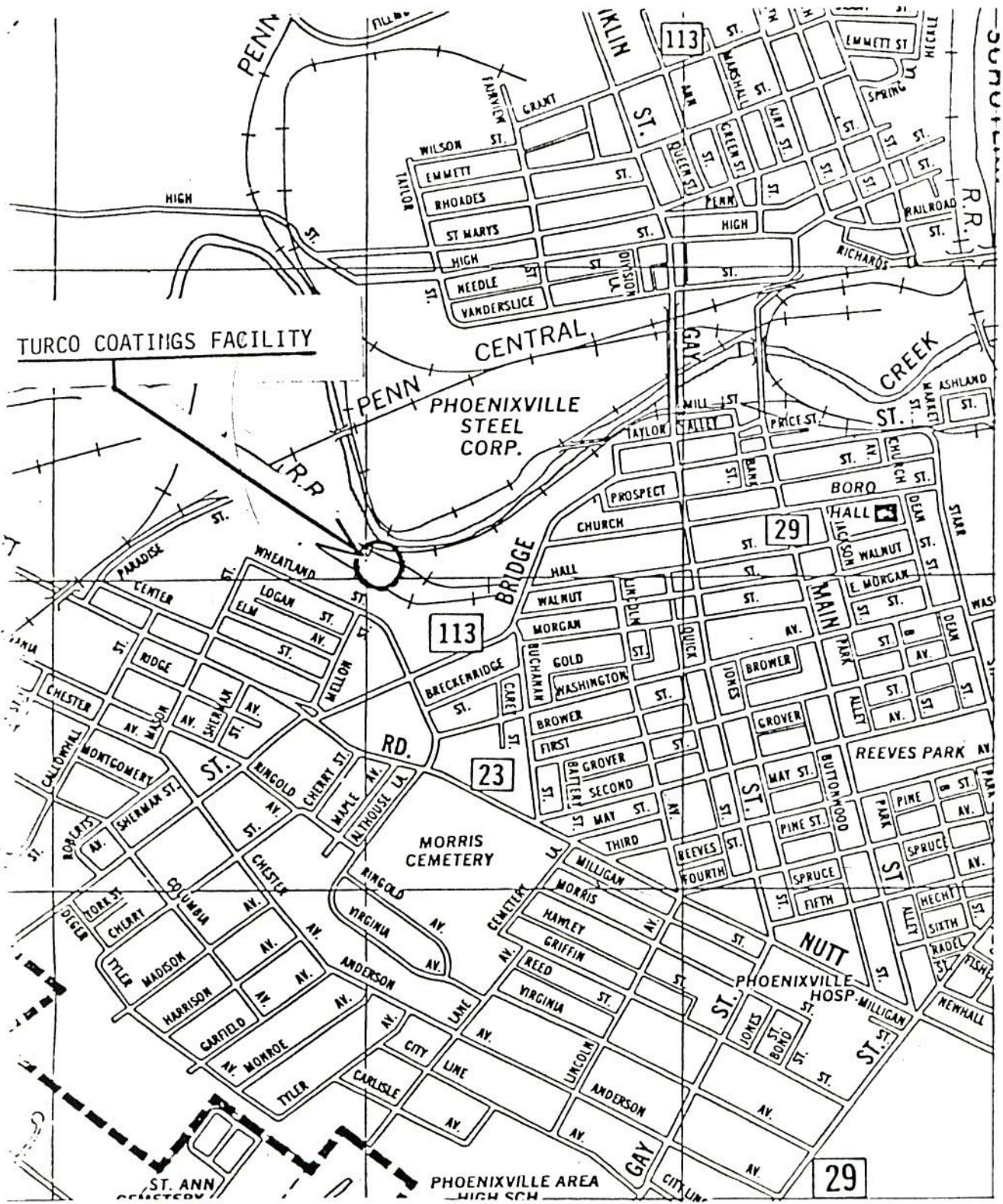
ORGANIZATION OF THE REMOVAL ACTION

TABLE OF ABBREVIATIONS

AST	US Coast Guard Atlantic Strike Team	919 338 1100
CCDES	Chester Co. Dep't. of Emergency Services	431 6160
CCDOH	Chester Co. Dep't. of Health	431 6160
CDC	Center for Disease Control	597 7291
DOH	Dep't. of Health	717 787 8842
EEB	US EPA Environmental Emergency Branch	597 9898
EPA OSC	US Environmental Protection Agency, On-Scene Coordinator	597 4553
ERT	US EPA Environmental Response Team	321 6660
PA DER OSC	Pennsylvania Dep't. of Environmental Resources On-Scene Coordinator	631 2420
PEMA	Pennsylvania Emergency Management Agency	717 783 8150
RRT	Regional Response Team	597 9800
TAT	Technical Assistance Team	609 663 7995

DISPOSAL FLOW CHART





FUND AUTHORIZATION REQUEST
IMMEDIATE REMOVAL PROJECT
TURCO COATINGS
PHOENIXVILLE, PA.

but 4
Phila.
C 3:45 p
Phila

1. OSC's name, region and telephone number?

Bruce Potoka, Region III, (215) 597-4553

2. a) What is the name and location of the incident?

Turco Coatings

Mellon and Wheatland Streets

Phoenixville, Pa.

PA-415

- b) Name of State Official who made the request for assistance?

Wayne Lynn

Regional Solid Waste Manager

Pennsylvania Department of Natural Resources

Norristown, Pa.

- c) Name of City Official who made the request for assistance?

Mark Coren

Borough Manager

Phoenixville, Pa.

3. What is the Nature of the Incident?

The Turco Coating site is located on the fringe of a residential/commercial neighborhood in Phoenixville, Pennsylvania. An estimated population of 500 people live within one mile of the site. On the site there are by actual count 550 drums of waste from the former owner, a paint and coating manufacturer. These drums are stored in an unfenced, unsecured area that is within 50 feet of approximately 25 homes and is immediately adjacent to property that has a fuel oil storage tank (approximately 100,000 gallons) within 100 feet of a shed and an area used to park fuel oil delivery trucks within 200 feet of a shed. The manner in which the unopened drums are stored (in an open shed) and their proximity to the fuel oil operation present a definite threat of contact for the public with the chemicals and a hazard of fire and explosion of catastrophic proportions.

Fire and Explosion Threat

A site visit on 2/3/83 by the Region III OSC, ERT, TAT, PA-DER and borough officials revealed evidence that the site was frequented by persons and used as a "hangout" by older teenagers ostensibly for drinking, as many beer cans were observed in an area next to the shed that had been used for campfires. Indeed the fire chief, Mr. Jack Krill, reported several fires on the site including one during the past month in a part of the shed not occupied by drums.

During the site visit, OVA, HNU and explosimeter readings were taken on the head space of open drums. Many gave a very high (over 250ppm) readings on the OVA and HNU and several of them "set off" the alarm on the explosimeter at 40% of the lower explosive limit (LEL). The combination of the accessibility of the drums and the explosive nature of the head space in the open drums presents a "clear and present" danger of an explosion on the site which could easily touch-off a secondary explosion and fire at the fuel oil operation next door. Such a fire could easily spread to the homes and businesses in the area. In addition, smoke and organic vapors, in the event of fire could possibly present an additional hazard through inhalation.

Direct Contact of the Public with the Chemicals

As stated above, the site visit revealed evidence of the area being used as the "hang out". The borough health officer Mr. Alexander Fahrer confirmed that the area has been used as a "shortcut" by neighborhood children who want to get French Creek. He also reported that a complaint was received from a resident that a 12 year old boy who was using the "shortcut" stepped into a deteriorating drum and was treated at the Phoenixville Hospital for skin irritation attributed to the chemicals in the drum area. The potential for this occurring again is clearly there since access to the drum ^{AREA WAS} is still not restricted.

4. Why did the OSC decide to Act? Why did State decide not to fund the action? The OSC, as mandated in the National Oil and Hazardous Substances Pollution Contingency Plan is to provide a coordinated Federal response capability at the scene of an unplanned or sudden discharge of oil or hazardous substance that posed a threat to the public health or welfare. In addition, the provision of the Compensation and Liability Act (CERCLA) promote a coordinated Federal, state and local response to mitigate situations at hazardous waste sites which pose an imminent hazard to public health. The Turco Coatings site presents an imminent hazard to public health, providing a legal basis for Federal response activities. The provisions of the National Contingency Plan were implemented by the Environmental Protection Agency, Region III, Philadelphia.

In July 1982 property owner began superficial cleanup of the property, to facilitate his leasing of a portion of his property. Cleaning efforts consisted of relocating waste materials to a unsecured, semi-enclosed area at the rear of the property, thereby greatly increasing the risk of fire and explosion. The owner has ~~refused~~ refused to take further action to remove the chemical wastes from the site. Recent Fire Department reports, including several fires within the last month, confirm the increased threat to the site has resulted in vandalism to the drum storage area, reported arson and consistent use of the facility by local youths. Approximately 700 people are employed within 1/2 mile of the site, and 25 residences within 1/10 mile. On an emergency basis, the Borough of Phoenixville has supplied interim police security to the area.

Based on the above, his own inspection and consultation with State and Local agencies, the OSC has determined that the site posed an imminent and substantial threat to the public health due to fire/explosion and direct contact.

The State of Pennsylvania has indicated that funds are not available to address the problems of the magnitude of this site. However, the State is investigating the possibility of providing the following necessary services:

- 1) Hydrogeological expertise.
- 2) Soil Science Expertise
- 3) Assistance with Monitoring and Site Safety.
- 4) Coordination with Local resources.
- 5) Assist EPA in finding an approved waste disposal site.

In addition, the Borough of Phoenixville has offered the following services:

- 1) Health Officer
- 2) Fire Marshall
- 3) Emergency Police Details
- 4) Building Inspector

5. Who certifies that this incident presents an imminent threat to public health and welfare?

- A. Alexander Fahrer, Health Officer, Phoenixville Board of Health
- B. John P. Maher, M.D. M.P.H., Director, Chester County Health Dept.
- C. James Logue, Dr. P.H., Director, Division of Env. Health, PA-Dept of Health.
- D. John Krill, Fire Marshall, Phoenixville Borough.
- E. Dr. Frank Lisella, Assoc. Director of Chronic Diseases Div., Center for Env. Health, Centers for Disease Control.
- F. Wayne Lynn, Regional Solid Waste Manager, PA Dept of Natural Resources.

6. How much money is needed to support response operations?

<u>Task</u>	<u>Cost</u>
Support Services	\$10,000.00
Drum Contents Disposal	\$19,000.00
Compatbility Testing	\$24,000.00
Labor & Equipment	\$70,000.00
Demobilization	\$20,000.00
Soil Disposal	\$ 2,000.00
Priority Pollutants Analytical Work	<u>\$10,000.00</u>
TOTAL	\$156,200.00

7. How will the money be utilized?

Superfund immediate removal monies will be used to mitigate the threat to the public health by:

- 1) removing and disposing of on site drums.
- 2) Requisite testing for disposal.
- 3) Compability testing to determine possibility of bulking wastes.
- 4) Removal and disposal of contaminated soil.
- 5) Support services to the operation to include security and a command post.

To date, no ~~thing~~ ^{action} has been given to this ~~project~~.

9. What is the status of enforcement action against the responsible party?
- To date, neither EPA nor the State of Pennsylvania have taken any enforcement action against the property owner.

10. What options were considered? Why was the preferred option selected?

Three options were considered by the EPA OSC in conjunction with the property owner.

1) No Action

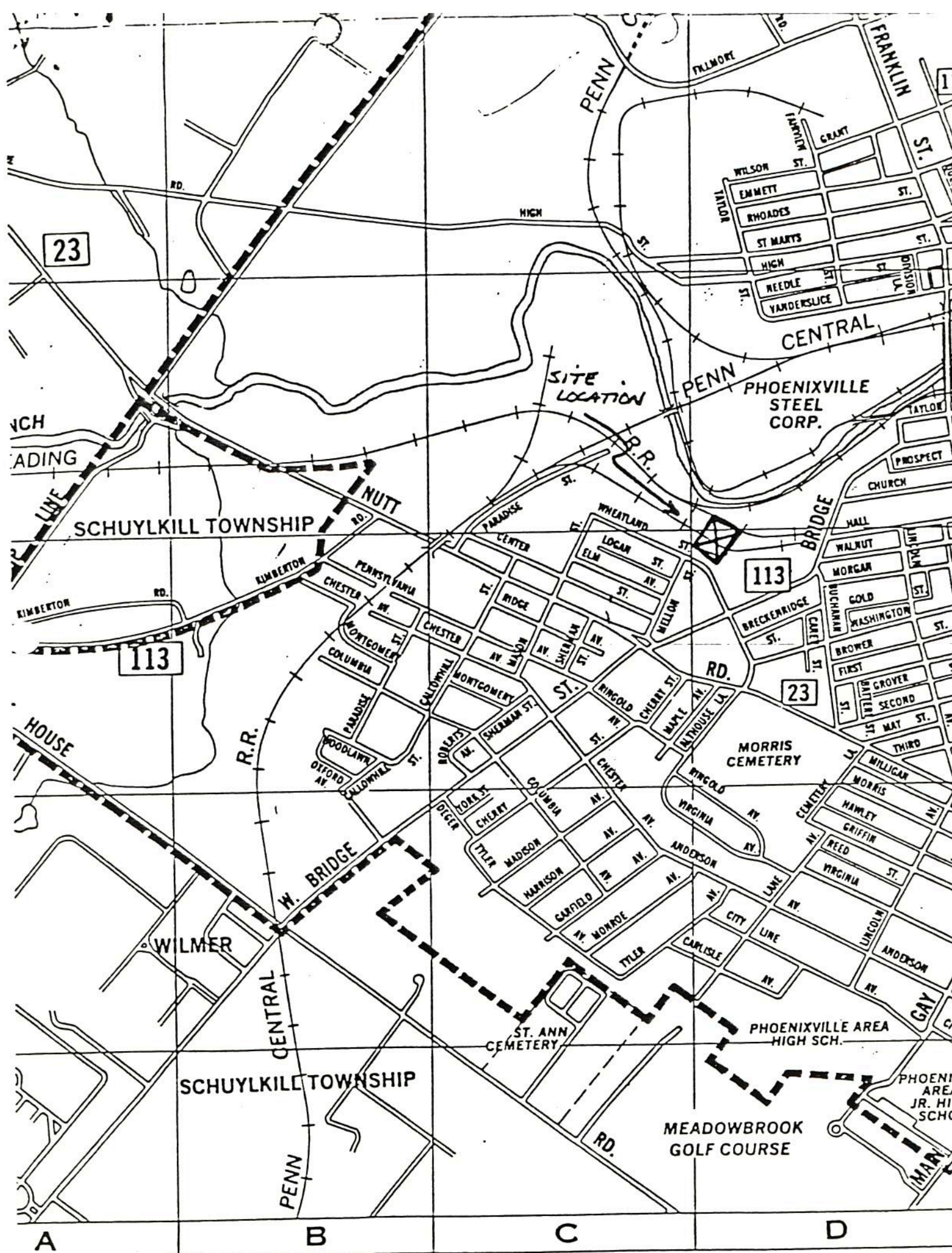
This option does not mitigate the environmental threat, allowing explosion hazard and direct contact to continue.

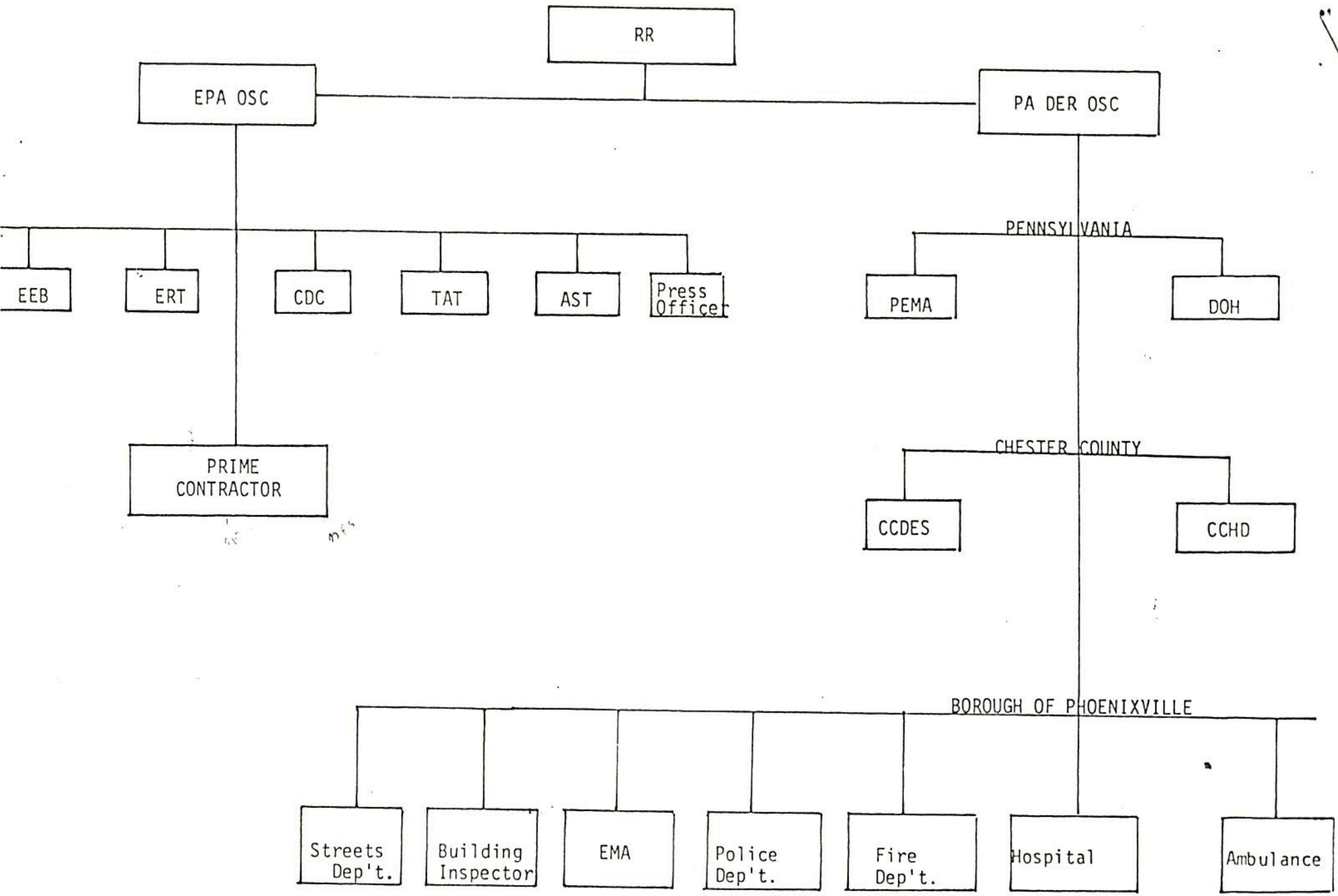
2) Installation of a security fence with no other action.

Again, this option would not alleviate the threat to the public from fire and explosion.

3) Removal action as per points 6 and 7

This is the selected option because it will mitigate the threat to public health via all routes-direct contact, fire and explosion -from



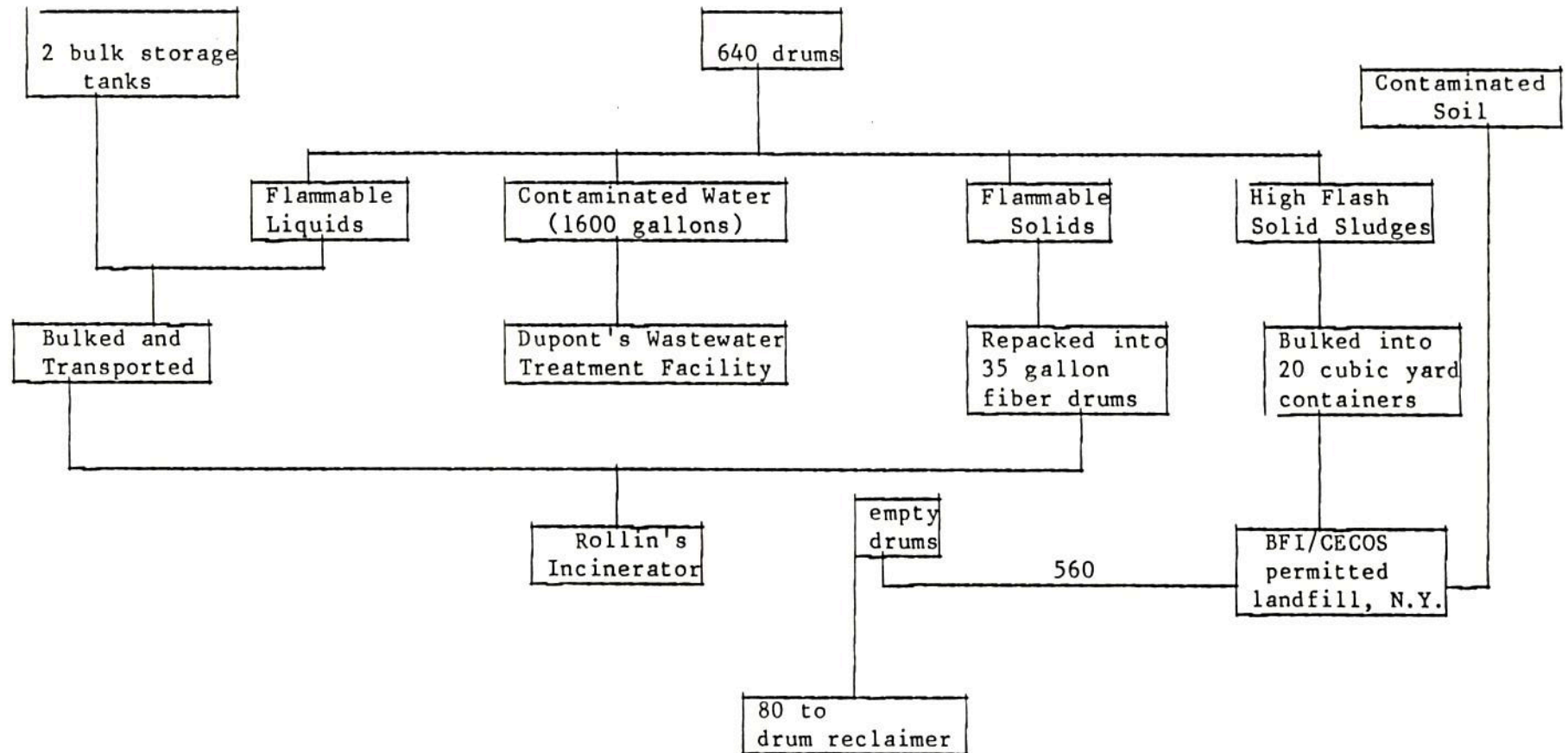


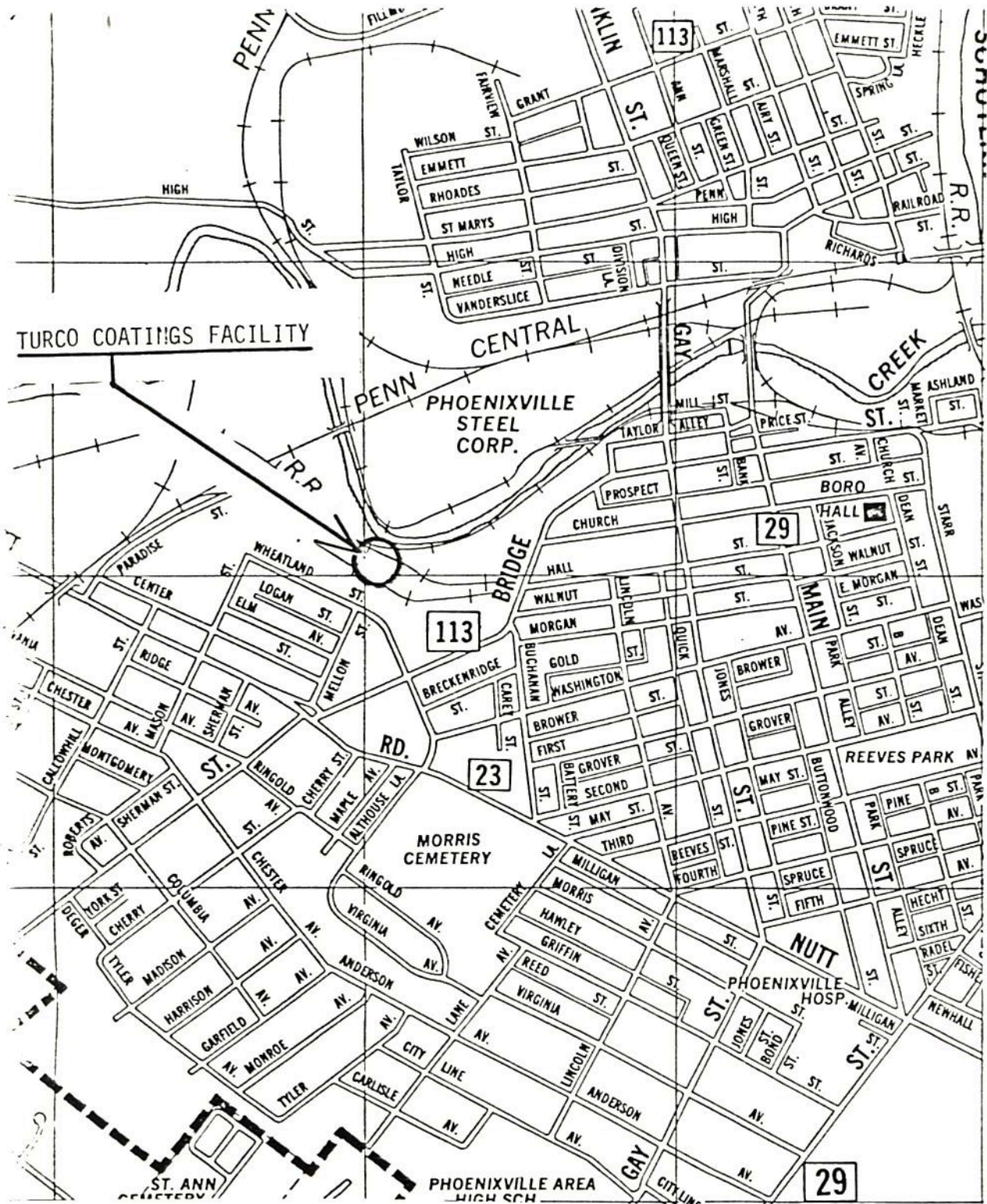
ORGANIZATION OF THE REMOVAL ACTION

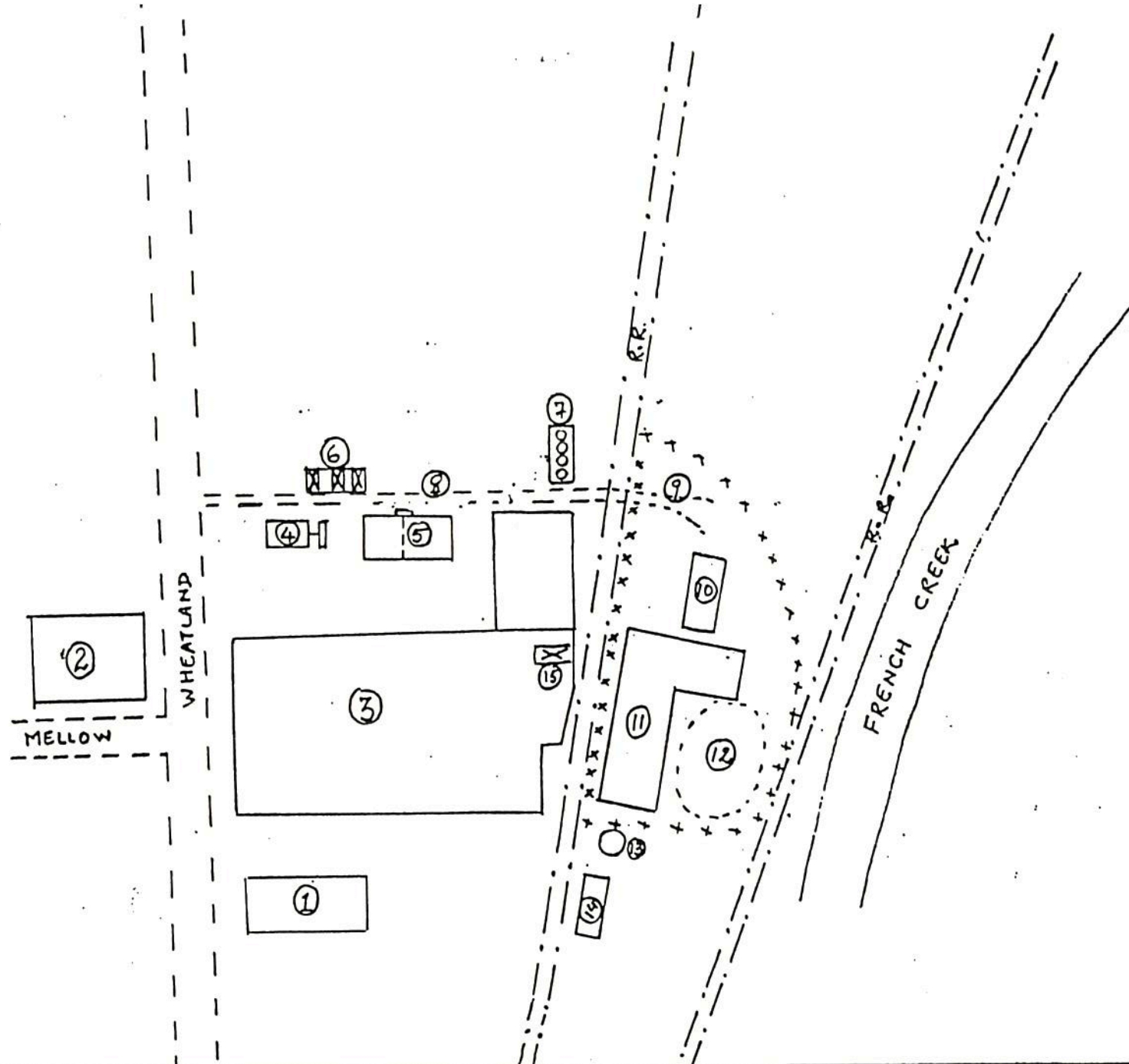
TABLE OF ABBREVIATIONS

AST	US Coast Guard Atlantic Strike Team	919 338 1100
CCDES	Chester Co. Dep't. of Emergency Services	431 6160
CCDOH	Chester Co. Dep't. of Health	431 6160
CDC	Center for Disease Control	597 7291
DOH	Dep't. of Health	717 787 8842
EEB	US EPA Environmental Emergency Branch	597 9898
EPA OSC	US Environmental Protection Agency, On-Scene Coordinator	597 4553
ERT	US EPA Environmental Response Team	321 6660
PA DER OSC	Pennsylvania Dep't. of Environmental Resources On-Scene Coordinator	631 2420
PEMA	Pennsylvania Emergency Management Agency	717 783 8150
RRT	Regional Response Team	597 9800
TAT	Technical Assistance Team	609 663 7995

DISPOSAL FLOW CHART







- S. T/ROAD
- RAILROAD
- x x x x EXCLUSION AREA
- ① BUSINESS AREA
- ② FACTORY
- ③ WAREHOUSE
- ④ UNDERGROUND TANK (5000)
- ⑤ SECONDARY DRUM STORAGE
- ⑥ 3 FUEL OIL TANKS (20,000 gal ea)
- ⑦ OLD COAL STORAGE SILO
- ⑧ DIRT ROAD
- ⑨ DIRT ROAD CONSTRUCTED CONTRACTOR
- ⑩ UNDERGROUND TANK (15,000 gallons)
- ⑪ PRIMARY DRUM STORAGE AREA
- ⑫ DRUM STAGING AREA
- ⑬ VERTICAL FUEL OIL STORAGE TANK (100,000 gall.)
- ⑭ COMMAND POST TRAILER
- ⑮ UNDERGROUND TANK

SITE SKETCH
 FOR
 TURCO COATINGS INC.

SECTION VI

EFFECTIVENESS OF RESPONSE AND REMOVAL

a. Discharger

No clean-up activity was performed by the discharger, Turco Coatings. This was due to the fact that Turco Coatings declared bankruptcy and was defunct at the time of the removal.

The current property owner was identified as a potential responsible party. A Letter of Federal Interest was sent to the property owner. The property owner informed the OSC on February 9, 1983 that he would not undertake any further removal activity.

b. State and Local Forces

The Commonwealth of Pennsylvania was represented by Frank Holmes of the Department of Environmental Resources. Mr. Holmes served as the State On-Scene Coordinator synchronizing a total of 14 State, County and local agencies during the removal. This logistical support greatly enhanced the efficient manner in which the removal was conducted.

The Borough of Phoenixville participated heavily in the removal. Virtually all the Borough offices, under the coordination of Borough Manager Mark Coren, provided the required logistic services necessary for the project. The Phoenixville Emergency Management Agency, represented by Donald Sees, was on-scene everyday to monitor progress of the removal. The Phoenixville EMA prepared the Community Relations Plan attached to this report.

c. Federal Agencies and Special Forces

EPA On-Scene Coordinator Bruce Potoka synchronized overall operations for the duration of the removal. Strategy meetings, press conferences and site activities were some of the OSC's duties. The OSC directed all Federal agencies involved in the removal. He coordinated very closely with the State OSC, Frank Holmes.

The National Oil and Hazardous Materials Contingency Plan provides for the availability of special forces to assist during response and removal activities. Two special forces were utilized during the Turco Coatings Removal. The EPA Environmental Response Team (ERT) was called upon to develop the Site Safety Protocol. The ERT provided scientific support to the OSC for the duration of the removal.

c. Federal Agencies and Special Forces (cont'd)

The United States Coast Guard - Atlantic Strike Team (AST) comprises the second special force utilized at Turco. Under the direction of Lieutenant Levy and Senior Chief Harrison, the AST provided logistical support including site safety monitoring, perimeter and on-site air monitoring, and detailed contract monitoring/cost control. The AST proved to be an invaluable, indispensable resource during the Turco Removal, which was the first Region III utilization of the team for a CERCLA funded project.

d. Contractors, Private Groups and Volunteers

The organizations and individuals contained in this heading were fundamental to a successful, expeditious and cost effective immediate removal.

Roy F. Weston, Inc.'s Technical Assistance Team (TAT), under contract to EPA, responded to the incident as requested by the OSC. TAT performed the initial site assessment and aided the OSC in drafting the Funding Request (10 point document). TAT provided the following technical functions:

- ° developed air monitoring plan
- ° developed disposal options and costs to ensure a cost-effective removal.
- ° developed a post removal status report
- ° detailed written and photographic logs of site activities.
- ° assistance in contractor monitoring
- ° other technical and logistical support as requested by the OSC.

The prime contractor of the removal was Rollins Environmental Services (NJ), Inc. This firm was hired to remove and dispose of all contaminated materials as directed by the OSC. Through meetings with the OSC, TAT and the AST, Rollins completed the removal in the most cost effective manner possible.

e. Community Relations Plan

A copy of the Community Relations Plan as prepared by the Phoenixville Emergency Management Agency and approved by the OSC, accompanies this report (Appendix A)

f. Site Safety Protocol

A copy of the site safety protocol as developed by ERT and approved by the OSC, accompanies this report (Appendix B).

SECTION VII

PROBLEMS ENCOUNTERED

Problems Encountered

The most challenging aspect of the cleanup was the staging, characterization, repacking and removal of the hazardous wastes from the mid-city location. The close proximity to many residents made it necessary to proceed with the utmost care to maintain a high level of protection for the residents. Close monitoring of the contractors activities and the continual monitoring of air quality resulted in the execution of this project without incident.

On-site activities were hampered by inclement weather. During the first day of operations the area's largest snow storm in recent history occurred. Over 24 inches of snow fell, seriously hampering on-site operations. A warming period, soon after this storm, caused this snow to melt, which created extremely muddy conditions making it difficult to utilize equipment on-site. In anticipation of the heavy snowfall, the OSC contacted the prime contractor and requested immediate mobilization. Equipment, command post and support trailers were on-scene within the hour. Without this foresight, the removal may have been postponed for several days.

As can be seen on the site sketch, the site buildings and buried tanks were in several different locations. Access to the secondary storage buildings was somewhat difficult. It was necessary to remove a section of fence and build a small road down to the site in order to transport drums stored in these buildings. In addition, the secondary storage buildings were located immediately adjacent to residences and operating companies. Special care had to be taken in order to handle drum transfers in a safe fashion.

The secondary storage building was in extremely, poor condition. A section of the roof had collapsed thus creating a safety concern.

SECTION VII

RECOMMENDATIONS

Recommendations - Means to Prevent a Recurrence of the Incident

EPA's Resource Conservation and Recovery Act (RCRA) was implemented to reduce the amount of improper storage and disposal of hazardous wastes. CERCLA was enacted to provide a means to protect the public health and the environment from improper disposal of hazardous wastes. Prior to the enactment of RCRA and CERCLA, hazardous waste disposal was virtually unregulated resulting in the evolution of hazardous waste sites such as the former Turco Coatings facility.

Increased inspection and enforcement of preventative regulations like RCRA should reduce the number of illegal dumps and operations requiring Superfund Activation in the future. It is inherent in the nature of environmental emergency response and removal actions that the mistakes of the past are the problems of today. Increased public awareness and increased Federal and State aggressiveness in emergency removals should result in more timely notification, assessment and clean-up of hazardous illegal dumps such as the former Turco Coatings facility.

SECTION IX

LEGAL ACTIONS

SECTION X

POLREPS